

The Task Force should review and update the January 5, 1996 Memorandum: "Regional Board Supplemental Instructions to SWB December 8, 1995 Interim Guidance on Required Cleanup at Low-Risk Fuel Sites."

The definitions of low risk soil and low risk groundwater cases can be used to exclude consideration of any site where free product exists. Free product is characterized as an "on-going" source even when the tanks have been removed. I suspect that there are many sites with stable plumes that meet the other elements of the definitions for low risk, but are not considered for closure because of the presence of free product.

The other elements of the definitions help analysts determine whether there is a significant risk to human health or the environment. Presumably, if there is no significant risk to human health or the environment, the site is low risk. SWB guidance should emphasize analysis of potential impacts rather than physical conditions to give the regulators more flexibility to close cases that exhibit free product and/or have concentrations of hydrocarbons that exceed MCLs.